

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 18-292
)	
ROBERT BOWERS)	

**MOTION TO EXTEND THE TIME
FOR FILING REPLY TO GOVERNMENT RESPONSE**

Defendant, Robert Bowers, through undersigned counsel, respectfully requests that his time for filing a reply to the government's Response in Opposition to Mr. Bowers' Jury Challenge Motion be continued for 7 days – to January 25, 2022. In support of this motion, counsel state as follows:

1. The government has filed a 70-page Response to Mr. Bowers' Jury Challenge Motion, with an attached expert report. ECF 659.
2. Pursuant to this Court's prior order, Mr. Bowers' reply to this Response is due on January 18, 2022. ECF 646.
3. Due to the nature of the prosecution, which includes the government's Notice of Intent to Seek the Death Penalty (*see* ECF 86), and the voluminous discovery, this Court has previously concluded that this case is "complex" within the meaning of the Speedy Trial Act, 18 U.S.C § 3161(h)(7)(B)(ii). ECF 52, 85, 108, and 225.
4. Given the complexity of the specific issues involved in the jury challenge, as evidenced by the filings to date, the voluminous supporting data, and the defense experts' need to review and analyze the government response and the government's

expert's report, Mr. Bowers hereby requests that his time for filing his reply be extended one week – to January 25, 2022.

5. After reviewing the government's response, undersigned counsel contacted government counsel this morning to ask if they would agree to an extension of the current deadline. Government counsel previously had agreed to a briefing schedule that provided Mr. Bowers with two weeks to reply to the response. *See* ECF 645. However, following today's status conference, government counsel responded that it could not agree to any extension of time.

6. In light of the foregoing, counsel for Mr. Bowers request that the Court extend the deadline to allow him two weeks to reply to the government's Response in Opposition to his Jury Challenge.

Respectfully submitted,

/s/ **Judy Clarke**

Judy Clarke

Clarke Johnston Thorp & Rice, PC

/s/ **Michael Burt**

Michael Burt

Law Offices of Michael Burt, PC

/s/ **Michael J. Novara**

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/s/ **Elisa A. Long**

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